



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

**75 Hawthorne Street
San Francisco, CA 94105-3901**

JUL 14 2016

Sent Via Certified Mail
7015 0640 0001 1118 1622
Return Receipt Requested

Ms. Haiyan Tang
Agent for Service of Process
Create & More, LLC
18221 S. Susana Road, Unit A
Rancho Dominguez, CA 90221

Subject: Request for Information under Section 308(a) of the Clean Water Act
EPA Docket No. CWA-308-9-16-005

Dear Ms. Tang:

On behalf of the U.S. Environmental Protection Agency (EPA) I am writing today to request information from Create & More, LLC regarding storm water management at Create & More's 18221 S. Susana Road, Rancho Dominguez, California location, and related business entities including, but not limited to: New Start Plastics, Inc.; 3T Holding, Inc.; System Solding (USA), Inc.; Altec Metal, Inc.; Altec Metal, LLC; and Allen Asset Management Group, LLC.

As you may know, EPA has performed stormwater compliance inspections on September 15, 2015, November 30, 2015, and June 9, 2016, at New Start Plastics, Inc., 3T Holding, Inc., and Allen Asset Management Group, LLC, respectively. Today's letter is to gather additional information from you related to those facilities and other facilities that may be related to those facilities for which you may have information.

Today's request for information is being directed to you, as the Agent for Service of Process for Create & More, LLC, 3T Holdings, Inc., and Altec Metal, Inc. pursuant to Section 308(a) of the Clean Water Act (CWA), 33 U.S.C. § 1318(a), which authorizes EPA to require persons subject to the CWA to furnish information, conduct monitoring, provide entry to the Administrator or authorized representatives, and make reports as may be necessary to carry out the objectives of the CWA.

Please submit answers to the questions we have asked in the enclosed Request for Information within 30 days of receipt of this letter. If you need more time, you must make the request within 20 days of receipt of this letter. When you submit your response to our questions, please include the following certification signed by you, your responsible corporate officer, or duly authorized representative:

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“I certify under penalty of law that this submission was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of those who manage the system or are directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations under the Clean Water Act and 18 U.S.C. § 1001.”

Providing information specified in this Information Request is mandatory. Failure to comply with this Information Request can result in enforcement action for appropriate relief and penalties under Section 309 of the CWA, 33 U.S.C. § 1319. Compliance with this Information Request does not relieve you of your obligation to comply with the CWA or other applicable laws and permits.

You cannot withhold from EPA what you consider confidential business information. However, you have the discretion to assert, at the time of submission, a claim of business confidentiality for part or all of the requested information by following the requirements at 40 C.F.R. § 2.203(b). EPA will not disclose any information covered by such a claim except as authorized by 40 C.F.R. Part 2, Subpart B. If no claim of business confidentiality is received with your submission, EPA may make the information available to the public without further notice to you. All confidentiality claims are subject to EPA verification.

This Information Request is not subject to review by the Office of Management and Budget under the Paperwork Reduction Act because it is directed to fewer than ten persons and is therefore not a “collection of information” under 44 U.S.C. §§ 3502(3). It is also an exempt activity under 44 U.S.C. § 3518(c) and 5 C.F.R. §1320.4.

Please submit the response to:

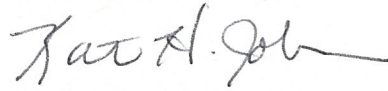
U.S. Environmental Protection Agency, Region 9
Enforcement Division (ENF-3-2)
75 Hawthorne Street
San Francisco, CA 94105-3901
Attention: Greg Gholson

EPA has created a number of helpful resources for small businesses. EPA has established the Small Business Compliance webpage at (www.epa.gov/compliance/small-business-compliance) which includes links to other resources as well. Finally, EPA has developed a fact sheet about the Small Business Regulatory Fairness Act, which is enclosed with this letter.

If you have questions regarding this Request for Information, please contact Greg Gholson at (415) 947-4209 or via email at gholson.greg@epa.gov. For legal questions, please contact Julia Jackson in our Office of Regional Counsel at (415) 972-3948 or via email at jackson.julia@epa.gov.

We appreciate your cooperation and prompt attention to this matter.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Kathleen H. Johnson", with a long horizontal flourish extending to the right.

Kathleen H. Johnson, Director
Enforcement Division

Enclosures: Request for Information
Small Business Resources Information Sheet

cc (w/encl): E. Solomon, LA RWQCB

Request for Information
CWA Section 308(a)
Create & More, LLC

1. Provide a narrative description of the relationship between Create & More, LLC, New Start Plastics, Inc., 3T Holding, Inc., System Solding (USA), Inc., Altec Metal, Inc., Altec Metal, LLC, and Allen Asset Management Group, LLC.
2. Identify the Agent for Service of Process for each of the business entities listed above in question #1, along with contact information including current telephone number and email address for each identified Agent for Service of Process.
3. Provide a list of all current and former physical addresses from January 1, 2010 to present for each of the business entities listed above in question #1.
4. Identify the industrial activity performed and the primary standard industrial classification (SIC) code for each entity listed in #1 above.
5. Provide the names, physical addresses, industrial activity performed, and primary SIC codes from January 1, 2016 to present for any additional business entities related to any of the business entities identified in question #1 above.
6. Provide the date that industrial activities commenced (i.e., start date), along with the physical address where industrial activities were performed, for each business entity listed in question #1 above.
 - a. Provide the date that industrial activities commenced, along with the physical address that industrial activities were performed, for any related business entities identified in response to question # 5 above.
7. Provide the date that industrial activities ceased, if applicable, along with the physical address that industrial activities were performed, for each business entity listed in question #1 above.
 - a. Provide the date that industrial activities ceased, if applicable, along with the physical address that industrial activities were performed, for any related business entities identified in response to question # 5 above.
8. Provide a narrative description of all actions taken at the New Start Plastics, Inc. facility located at 510 W. Carob Street, Compton, California to address EPA's September 15, 2015 inspection findings, including but not limited to, all actions taken to obtain authorization to discharge storm water associated with industrial activities under the State of California's *NPDES General Permit for Storm Water Discharges Associated with Industrial Activities* (NPDES Order No. CAS000001).

9. Provide a narrative description of all actions taken at the 3T Holding, Inc. facility located at 18221 S. Susana Road, Rancho Dominguez, California in response to EPA's November 30, 2015 inspection findings.
- a. If 3T Holding, Inc. has ceased operations at 18221 S. Susana Road, Rancho Dominguez, California, provide: the date that operations ceased; a narrative description of all actions taken to clean-up the site to ensure that residual pollutants from past industrial activities do not continue to pose a risk of contaminating storm water runoff; and, if applicable, the address of any new physical location(s) established for 3T Holding, Inc.'s industrial operations.
10. Provide a narrative description of all actions taken at the Allen Asset Management Group, LLC facility located at 14131 South Avalon Boulevard, Los Angeles, California since EPA's June 9, 2016 inspection, including but not limited to, all actions taken to obtain authorization to discharge storm water associated with industrial activities under the State of California's *NPDES General Permit for Storm Water Discharges Associated with Industrial Activities* (NPDES Order No. CAS0000001).



U.S. EPA Small Business Resources Information Sheet

The United States Environmental Protection Agency provides an array of resources to help small businesses understand and comply with federal and state environmental laws. In addition to helping small businesses understand their environmental obligations and improve compliance, these resources will also help such businesses find cost-effective ways to comply through pollution prevention techniques and innovative technologies.

Small Business Programs

www.epa.gov/smallbusiness
EPA's Office of Small Business Programs (OSBP) advocates and fosters opportunities for direct and indirect partnerships, contracts, and sub-agreements for small businesses and socio-economically disadvantaged businesses.

EPA's Asbestos Small Business Ombudsman

www.epa.gov/sbo or 1-800-368-5888
The EPA Asbestos and Small Business Ombudsman (ASBO) serves as a conduit for small businesses to access EPA and facilitates communications between the small business community and the Agency.

EPA's Compliance Assistance Homepage

www2.epa.gov/compliance
This page is a gateway industry and statute-specific environmental resources, from extensive web-based information to hotlines and compliance assistance specialists.

EPA's Compliance Assistance Centers

www.assistancecenters.net
EPA's Compliance Assistance Centers provide information targeted to industries with many small businesses. They were developed in partnership with industry, universities and other federal and state agencies.

Agriculture

www.epa.gov/agriculture/

Automotive Recycling

www.ecarcenter.org

Automotive Service and Repair

ccar-greenlink.org/ or 1-888-GRN-LINK

Chemical Manufacturing

www.chemalliance.org

Construction

www.cicacenter.org or 1-734-995-4911

Education

www.campuserc.org

Food Processing

www.fpeac.org

Healthcare

www.hercenter.org

Local Government

www.lgean.org

Metal Finishing

www.nmfrc.org

Paints and Coatings

www.paintcenter.org

Printing

www.pneac.org

Ports

www.portcompliance.org

Transportation

www.tercenter.org

U.S. Border Compliance and Import/Export Issues

www.bordercenter.org

EPA Hotlines, Helplines and Clearinghouses

www2.epa.gov/home/epa-hotlines

EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. Some examples are:

Clean Air Technology Center (CATC) Info-line

www.epa.gov/ttn/catc or 1-919-541-0800

Superfund, TRI, EPCRA, RMP and Oil Information Center

www.epa.gov/superfund/contacts/infocenter/index.htm or 1-800-424-9346

EPA Imported Vehicles and Engines Public Helpline

www.epa.gov/otaq/imports or 734-214-4100

National Pesticide Information Center

www.npic.orst.edu/ or 1-800-858-7378

National Response Center

Hotline to report oil and hazardous substance spills - www.nrc.uscg.mil or 1-800-424-8802

Pollution Prevention Information Clearinghouse (PPIC) -

www.epa.gov/opptintr/ppic or 1-202-566-0799

Safe Drinking Water Hotline -

www.epa.gov/drink/hotline/index.cfm or 1-800-426-4791

Stratospheric Ozone Protection Hotline

www.epa.gov/ozone/comments.htm or 1-800-296-1996

Toxic Substances Control Act (TSCA) Hotline

tsca-hotline@epa.gov or 1-202-554-1404

Small Entity Compliance Guides

<http://www.epa.gov/sbrefa/compliance-guides.html>

EPA publishes a Small Entity Compliance Guide (SECG) for every rule for which the Agency has prepared a final regulatory flexibility analysis, in accordance with Section 604 of the Regulatory Flexibility Act (RFA).

Regional Small Business Liaisons

<http://www.epa.gov/sbo/rsbl.htm>

The U.S. Environmental Protection Agency (EPA) Regional Small Business Liaison (RSBL) is the primary regional contact and often the expert on small business assistance, advocacy, and outreach. The RSBL is the regional voice for the EPA Asbestos and Small Business Ombudsman (ASBO).

State Resource Locators

www.envcap.org/statetools

The Locators provide state-specific contacts, regulations and resources covering the major environmental laws.

State Small Business Environmental Assistance Programs (SBEAPs)

www.epa.gov/sbo/507program.htm

State SBEAPs help small businesses and assistance providers understand environmental requirements and sustainable business practices through workshops, trainings and site visits.

EPA's Tribal Portal

www.epa.gov/tribalportal/

The Portal provides access to information on environmental issues, laws, and resources related to federally recognized tribes.

EPA Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated, businesses may be eligible for penalty waivers or reductions. EPA has two such policies that may apply to small businesses:

EPA's Small Business Compliance Policy

www2.epa.gov/enforcement/small-businesses-and-enforcement

This Policy offers small businesses special incentives to come into compliance voluntarily.

EPA's Audit Policy

www2.epa.gov/compliance/epas-audit-policy

The Policy provides incentives to all businesses that voluntarily discover, promptly disclose and expeditiously correct their noncompliance.

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established a SBREFA Ombudsman and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. If you believe that you fall within the Small Business Administration's definition of a small business (based on your North American Industry Classification System designation, number of employees or annual receipts, as defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community in response to comments made under SBREFA.

Your Duty to Comply

If you receive compliance assistance or submit a comment to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act or related provisions.